

1 NICHOLAS A. TRUTANICH, NV No. 13644  
2 United States Attorney  
3 BLAINE T. WELSH  
Chief, Civil Division  
District of Nevada

4 ELLINOR R. CODER  
5 Special Assistant United States Attorney  
6 Social Security Administration  
7 160 Spear St., Suite 800  
8 San Francisco, CA 94105  
Telephone: (415) 977-8955  
Facsimile: (415) 744-0134  
Email: Ellinor.Coder@ssa.gov  
8 Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

12 DARRIN DUHAMEL, ) Case No.: 2:17-cv-02858-GMN-EJY  
13 Plaintiff, )  
14 vs. ) **UNOPPOSED MOTION FOR**  
15 ANDREW SAUL, ) **EXTENSION OF TIME**  
16 Commissioner of Social Security, ) **(THIRD REQUEST)**  
17 Defendant. )

19 Defendant Andrew Saul, Commissioner of Social Security (“Defendant”), respectfully  
20 requests that the Court extend the time for Defendant to file a response to the Magistrate Judge’s  
21 Report and Recommendation by seven (7) days, through and until October 7, 2019. This is  
22 Defendant’s third request for an extension of time. The Court granted Defendant’s first  
23 requested extension to respond to Plaintiff’s Complaint (Dkt. 11) and second requested extension  
24 to allow additional time for the parties to discuss voluntary remand (Dkt. 56).

25 Defendant moved to voluntarily remand this case for further proceedings (Dkt. 57). At  
26 issue in the parties' merits briefs were the terms of that remand. Defendant requests additional

1 time to respond to the Magistrate Judge's Report and Recommendation (Dkt. 68) due to  
2 workload conflicts. The undersigned counsel drafted and filed three merits briefs, one  
3 stipulation to remand, and an answer during the 14-day period for response to the Report and  
4 Recommendation. In addition, the Commissioner's response must be reviewed by supervisory  
5 personnel who require additional time due to tasks associated with the fiscal year end.

6 The undersigned contacted Plaintiff on September 26, 2019, and Plaintiff indicated that  
7 he consents to this extension.

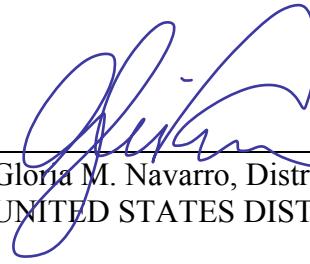
8

9 Respectfully submitted this 30th day of September 2019.

10 NICHOLAS A. TRUTANICH  
11 United States Attorney

12 //s// Ellinor R. Coder  
13 ELLINOR R. CODER  
14 Special Assistant United States Attorney

15 IT IS SO ORDERED:

16   
17 Gloria M. Navarro, District Judge  
18 UNITED STATES DISTRICT COURT

19 DATED this 1 day of October, 2019.  
20

21

22

23

24

25

26

## **CERTIFICATE OF SERVICE**

2 I, Ellinor R. Coder, certify that the following individual was served with a copy of the  
3 UNOPPOSED MOTION FOR EXTENSION OF TIME on the date and via the method of  
service identified below:

4 CM/ECF:

5 Darrin Duhamel  
6 301 Banuelo Drive  
Henderson, NV 89014

Dated this 30th day of September 2019.

//s// Ellinor R. Coder  
ELLINOR R. CODER  
Special Assistant United States Attorney